<u>REMARKS/ARGUMENTS</u>

Claims 1-6, 9-29, 32-54, 57, 61-69, and 71 remain pending in the application. Claims 1-70 were rejected and claim 71 was found to be allowable. Applicant thanks the Examiner for the indication of allowable subject matter. Applicant, by this paper, amends claims 1, 15, 24, 38, 47, 50, 61 and 64 and cancels without prejudice claims 7-8, 30-31, 55-56, 58-60, and 70. No new matter is added by this amendment. Applicant respectfully requests reconsideration and allowance of all pending claims.

Discussion of Rejections Under 35 U.S.C. §102

Claims 1-9, 11-24, 27-31, 33-38, 43-58, and 61-70 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 6,445,927 to King et al. (hereinafter King). Applicant, by this paper, cancels claims 7-8, 30-31, 55-56, 58-60, and 70, thus rendering moot the rejection of those claims. Applicant also amends claims 1, 15, 24, 38, 47, 50, 61 and 64 and respectfully submits that claims 1, 15, 24, 38, 47, 50, 61 and 64, and the claims depending therefrom, are allowable over King.

Claim 1 recites a method that includes "receiving a timing bias from the wireless communication system, wherein the timing bias includes a common system synchronization bias that defines a difference between a system time for the satellite navigation system and a system time for the wireless communication system." Support for this claim element can be found, for example, at paragraph [0029] of Applicant's Specification, as filed.

The method also includes "determining a position solution for a mobile unit based on a hybrid position location technique for an asynchronous environment, and as a function of the received signals, a number of independent measurements based on a position location technique for a synchronous environment, and using a the common system synchronization bias." Support for the claim element can be found, for example, at paragraphs [0024] through [0025] of Applicant's Specification, as filed. In particular, the paragraphs from Applicant's Specification describe synchronous and asynchronous hybrid positioning techniques and describe the ability to determine the position of the mobile using asynchronous techniques, where the inclusion of constraint relating to the system time allow position solution using asynchronous techniques without the additional measurement over synchronous techniques.

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This combination of features is neither described nor suggested by King.

King fails to describe synchronous or asynchronous hybrid position location techniques and fails describe how the two position location techniques may utilize different numbers of measurements. As such, King fails to relate a common system synchronization bias to the number of measurements needed to determine a mobile station position using hybrid position location techniques for an asynchronous environment. Thus, King fails to describe the combination of claimed features in the manner set forth in the claim. Applicant respectfully requests reconsideration and allowance of claim 1.

Claims 15, 24, 38, 47, 50, 61 and 64 were amended to include features similar to those discussed and distinguished above in relation to claim 1. In particular, **claim 15** includes the feature "computing, a position solution for the mobile unit based on a hybrid position location technique for an asynchronous environment, and as a function of a number of independent measurements based on a position location technique for a synchronous environment, and the common system synchronization bias data." **Claim 24** includes the feature "a processor to compute a position solution for a mobile unit based on a hybrid position location technique for an asynchronous environment as a function of the received signals using a number of independent measurements based on a position location technique for a synchronous environment, and a common system synchronization bias." **Claim 38** includes the feature "a device to receive the common system synchronization bias data from the server, and determine a position solution based on a hybrid position location technique for an asynchronous environment as a function of the common synchronization bias data and signals received from the satellite navigation system and the wireless communication system and a number of independent measurements based on a position location technique for a synchronous environment." **Claim 47** includes the feature "determining a position solution for the device based on a hybrid position location technique for an asynchronous environment as a function of the signals, a number of independent measurements based on a position location technique for a synchronous environment, and a common system synchronization bias." **Claim 50** includes the feature "instructions to cause a processor to determine a position solution for a mobile unit based on a hybrid position location technique for an asynchronous environment as a function of signals received from a satellite navigation system, signals received from a wireless communication system, a number of

independent measurements based on a position location technique for a synchronous environment, and a common system synchronization bias." **Claim 61** includes the feature "computing a position solution for the device based on a hybrid position location technique for an asynchronous environment as a function of the measurements, wherein a number of independent measurements is based on a position location technique for a synchronous environment, and the common bias." **Claim 64** includes the feature "determining a position solution for the device based on a hybrid position location technique for an asynchronous environment as a function of the measurements and the system times wherein a number of independent measurements is based on a position location technique for a synchronous environment."

As discussed above in relation to claim 1, King fails to describe both asynchronous hybrid position location techniques and synchronous hybrid position location techniques, and fails to describe how the inclusion of knowledge of a common time bias can reduce or otherwise affect the number of measurements needed when using asynchronous hybrid position location techniques.

Therefore, Applicant respectfully requests reconsideration and allowance of claims 15, 24, 38, 47, 50, 61 and 64.

Discussion of Dependent Claims

Claims 2-6, 9-14, 25-29, 32-37, 39-49, 51-54, 57, 62-63, and 65-69 depend, either directly or indirectly from one of claims 1, 15, 24, 38, 47, 50, 61 or 64 and are believed to be allowable at least for the reason that they depend from an allowable base claim.

The dependent claims that were rejected as anticipated by King are believed to be allowable at least for the reason that King fails to describe every claimed feature of the independent claims from which they depend.

The dependent claims that were rejected under 35 U.S.C. §103(a) as unpatentable over King in view of U.S. Patent Application Publication No. 20030236818 to Bruner et al. (hereinafter Bruner) are believed to be allowable at least for the reason that they depend from an allowable base claim.

Additionally, with respect to the independent claims, Bruner fails to cure the deficiencies in King, and the combination of Bruner with King fails to teach or suggest the features discussed above in relation to the rejections under 35 U.S.C. §102. At the very least, Bruner fails to teach, discuss, or even describe synchronous or asynchronous hybrid position location techniques. Because King also fails to describe these same claimed features, the combination of Bruner with King fails to teach or suggest a feature that is absent from each reference individually.

Applicant respectfully requests reconsideration and allowance of dependent claims 2-6, 9-14, 25-29, 32-37, 39-49, 51-54, 57, 62-63, and 65-69.

CONCLUSION

Applicant believes that all claims pending in the application are allowable. Applicant therefore respectfully requests that a timely Notice of Allowance be issued in this case.
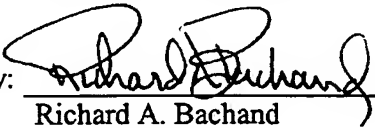
Applicant believes that the instant response is filed within the Shortened Statutory period for response provided in the Office Action of November 1, 2007.

If there are any other fees due in connection with the filing of the response, please charge the fees to our Deposit Account No. 17-0026. If a fee is required for an extension of time under 37 CFR 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned.

Respectfully submitted,

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